

Kyle, Wonda - ESA

From: Joe Coute [jcoute@westaff.com]
Sent: Tuesday, May 25, 2004 2:23 PM
To: 'ofccp-public@dol.gov'
Subject: Definition of Applicant



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I am writing in support of the proposed "conforming regulation" criteria regarding an employer's definition of "applicant" when receiving resumes via the internet. The challenge of gathering EEO data under the proposed Interagency Guidance will not advance the objective of tracking applicants due to the very likely lack of compliance with such requests from employers. In particular, criteria (2) and (3) make this a much more reasonable approach to this problem in that very often resumes (expressions of interest) are received which do not meet minimum qualifications for the advertised position, but rather are sent in hopes of being diverted to another position not yet advertised. This is a burden plaguing employers who solicit resumes via the internet, despite stating pre-requisite experience and conditions.

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